

In re:  
Lisa Rose Mariani  
Debtor(s)

Case No. 17-13760-mdc  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0313-2  
Date Rcvd: Oct 28, 2020

User: Adminstra  
Form ID: pdf900

Page 1 of 2  
Total Noticed: 7

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 30, 2020:

Recip ID	Recipient Name and Address
db	+ Lisa Rose Mariani, 135 Grandview Rd, Ardmore, PA 19003-3112
cr	+ Lower Merion Township, c/o Portnoff Law Associates, Ltd., P.O. Box 3020, Norristown, PA 19404-3020

TOTAL: 2

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
smg	Email/Text: megan.harper@phila.gov	Oct 29 2020 02:42:00	City of Philadelphia, City of Philadelphia Law Dept., Tax Unit/Bankruptcy Dept, 1515 Arch Street 15th Floor, Philadelphia, PA 19102-1595
smg	Email/Text: RVSVCBICNOTICE1@state.pa.us	Oct 29 2020 02:41:00	Pennsylvania Department of Revenue, Bankruptcy Division, P.O. Box 280946, Harrisburg, PA 17128-0946
smg	+ Email/Text: usapae.bankruptcynotices@usdoj.gov	Oct 29 2020 02:42:00	U.S. Attorney Office, c/o Virginia Powel, Esq., Room 1250, 615 Chestnut Street, Philadelphia, PA 19106-4404
cr	+ Email/Text: bnc@atlasacq.com	Oct 29 2020 02:41:00	Atlas Acquisitions LLC, 294 Union St., Hackensack, NJ 07601-4303
cr	+ Email/PDF: gecsedl@recoverycorp.com	Oct 29 2020 02:08:39	Synchrony Bank, c/o PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021

TOTAL: 5

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Oct 30, 2020

Signature: /s/Joseph Speetjens

District/off: 0313-2

User: Adminstra

Page 2 of 2

Date Rcvd: Oct 28, 2020

Form ID: pdf900

Total Noticed: 7

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 28, 2020 at the address(es) listed below:

Name	Email Address
HEATHER STACEY RILOFF	on behalf of Creditor Seterus Inc., as the authorized subservicer for Federal National Mortgage Association ("Fannie Mae"), creditor heather@mvrllaw.com, Michelle@mvrllaw.com
HEATHER STACEY RILOFF	on behalf of Creditor FEDERAL NATIONAL MORTGAGE ASSOCIATION ("FANNIE MAE") heather@mvrllaw.com Michelle@mvrllaw.com
JAMES RANDOLPH WOOD	on behalf of Creditor Lower Merion Township jwood@portnoffonline.com jwood@ecf.inforuptcy.com
JOSEPH JASPER SWARTZ	on behalf of Creditor PA Dept of Revenue RA-occbankruptcy2@state.pa.us RA-occbankruptcy6@state.pa.us
KEVIN S. FRANKEL	on behalf of Creditor Nationstar Mortgage LLC D/B/A Mr. Cooper pa-bk@logs.com
PAUL A.R. STEWART	on behalf of Debtor Lisa Rose Mariani pstewart@legalhelm.com jurisabnelson@gmail.com
REBECCA ANN SOLARZ	on behalf of Creditor Nationstar Mortgage LLC D/B/A Mr. Cooper bkgroup@kmlawgroup.com
United States Trustee	USTPRegion03.PH.ECF@usdoj.gov
WILLIAM C. MILLER, Esq.	ecfemails@ph13trustee.com philaecf@gmail.com

TOTAL: 9

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13  
: NO. 17-13760-MDC  
Lisa Rose Mariani, :  
: MOTION TO MODIFY PLAN  
: as per 11 USC 1329(d)(1)(A)

**ORDER**

AND NOW, this 28<sup>th</sup> day of October 2020, upon consideration of the Debtor(s)  
Motion to Modify Confirmed Chapter 13 Plan pursuant to the Federal Bankruptcy Rule of  
Procedure 1329(d)(1)(A), and any response thereto, and after a hearing on the matter, it  
appears that the Debtor has experienced a material financial hardship due directly to the coronavirus  
disease 2019 (COVID-19) pandemic.

B. Debtor proposes a new plan repayment period, not to exceed 7 years after the time first  
payment under the original confirmed plan was due.

C. Debtor's new repayment period shall expire on June 30, 2024.

WHEREFORE it is ORDERED that the Debtor's Motion to Modify the Plan is

GRANTED.



Magdeline D. Coleman  
Chief U.S. Bankruptcy Judge

HELM LEGAL SERVICES LLC  
Paul AR Stewart, Esquire #307997  
333 East Lancaster Ave STE 140  
Wynnewood PA 19096  
610-864-5600

Counsel for Debtor

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13  
: NO. 17-13760-MDC  
Lisa Rose Mariani, :  
: MOTION TO MODIFY PLAN  
: as per 11 USC 1329(d)(1)(A)

**DEBTOR'S MOTION TO MODIFY CONFIRMED CHAPTER 13 PLAN  
PURSUANT TO 11 USC 1329(d)(1)(A)  
COVID-19 PANDEMIC MATERIAL FINANCIAL HARDSHIP.**

Lisa Rose Mariani (hereinafter "Debtor"), through her counsel Paul AR Stewart, Esq., hereby respectfully moves this Court (the "Motion"), pursuant to Rule 1329(d) ("Rule 1329") of the Federal Rules of Bankruptcy Procedure (as amended, the "Bankruptcy Rules"), for entry of an order modifying her confirmed Chapter 13 Plan and respectfully states as follows:

1. Debtor filed this Chapter 13 case on May 31, 2017.
2. This Honorable Court confirmed the Chapter 13 Repayment Plan by Order dated 19 September 2019, Doc # 135.
3. Debtor has complied with her Chapter 13 plan. This is a 100% repayment plan.
4. Debtor's plan has a balance due of \$60,010.12. Debtors current repayment amount is \$2,188.83 including the US Trustee Commission.
5. Debtor's current plan expires on June 30, 2022.
6. Debtor filed a Motion to Modify Plan on May 20, 2020 and requested extended repayment period. See Motion- Doc#151.
7. Debtor seeks to modify to the expiration of her plan to June 30, 2024.
8. Debtor proposes a modified repayment amount of \$1363.87 for 44 months.

9. President Trump signed the “Coronavirus Aid, Relief, and Economic Security Act” or the “CARES Act” on March 27, 2020. Section 1113 of the CARES Act amended Section 1329 of Title 11 by adding new subsection (d).

10. Subsection (d) provides a debtor may request to modify a plan confirmed before enactment of the (CARES Act) Subsection (d)(1) if:

A. The debtor is experiencing or has experienced a material financial hardship due, directly or indirectly, to the coronavirus disease 2019 (COVID-19) pandemic; and

B. The modification is approved after notice and a hearing.

(2) A plan modified under paragraph (1) may not provide for payments over a period that expires more than 7 years after the time that the first payment under the original confirmed plan was due.

See 11 USC Section 1329(d).

11. Debtor has suffered financial loss as a result of unemployment directly or indirectly due to the COVID-19 Pandemic. Debtor worked for a child care center. Following a shelter at home state wide order – the day care closed. Debtor became unemployed.

12. Furthermore, Debtor’s spouse, a construction contractor, has suffered material hardship and loss of work directly due to work closures and stay-at-home general government orders effective March 12, 2020 which prevented him from working. Debtor spouse reports loss of revenue exceeding \$30,000

**Relief Requested:**

Debtor moves this Honorable Court for an order modifying her confirmed chapter 13 plan and granting any further relief this Court may deem proper.

Respectfully submitted,

Date: October 13, 2020

/s/ Paul A.R. Stewart  
Paul A.R. Stewart  
Counsel for Debtor

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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<b>IN RE:</b>	:	<b>CHAPTER: 13</b>
<b>LISA ROSE MARIANI</b>	:	<b>CASE NO: 17-13760-MDC</b>
	:	
<b>DEBTOR</b>	:	<b>MOTION TO MODIFY PLAN</b>
	:	<b>as per 11 USC 1329(d)(1)(A)</b>

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**CERTIFICATE OF SERVICE**

I, Paul A. R. Stewart, Esquire, hereby certify that on October 13, 2020, I served  
via first class regular mail and/or electronic filing, with a true and correct copy of the  
Debtor's Motion to Modify Plan as per 11 USC 1329(d)(1)(A) upon:

**Counsel for Bank**

Kevin S. Frankel  
Shapiro & DeNardo, LLC  
3600 Horizon Drive, Suite 150  
King of Prussia, PA 19406  
610-278-6800

Rebecca Ann Solarz  
KML Law Group  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
215-825-6327

United States Trustee  
833 Chestnut Street, Suite 500  
Philadelphia, PA 19107

William C. Miller, Esquire (Trustee)  
1234 MARKET STREET, SUITE 1813  
PHILADELPHIA, PA 19107

/s/ Paul A.R. Stewart  
Paul A.R. Stewart  
Helm Legal Services  
333 E. Lancaster Ave  
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610-864-5600  
[pstewart@legalhelm.com](mailto:pstewart@legalhelm.com)  
Counsel for Debtor